

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

TRUSTPILOT DAMAGES LLC,  
individually and on behalf of all others similarly  
situated,

*Plaintiff,*

v.

TRUSTPILOT INC. and TRUSTPILOT A/S,

*Defendants.*

Civil Action No. 1:21-cv-00432-JSR

**NOTICE OF MOTION TO DISMISS**

Defendant Trustpilot, Inc. (“Defendant”) hereby files this Notice of Motion pursuant to Rule 2(d) of the Court’s Individual Rules of Practice.

PLEASE TAKE NOTICE that Defendant will move this Court, before the Honorable Jed S. Rakoff, at the United States Courthouse, 500 Pearl St., Courtroom 14-B, New York, New York 10007, on April 30, 2021, at 11:00 am, or at such other date and time determined by the Court, for an order pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), dismissing with prejudice Plaintiff’s Complaint in its entirety, and granting such other relief as the Court deems just and proper.

As directed by the Court, Defendant has filed and served its Motion to Dismiss on March 12, 2021. Plaintiff shall file any opposition to this motion on or before April 9, 2021, and Defendant shall file any reply on or before April 23, 2021. Telephonic oral argument is scheduled for April 30, 2021, at 11:00 am.

Dated: New York, New York  
March 12, 2021

**MCDERMOTT WILL & EMERY LLP**

/s/ Andrew B. Kratenstein

Andrew B. Kratenstein  
Caroline A. Incledon  
Kierstin S. Fowler  
340 Madison Avenue  
New York, New York 10173-1922  
(212) 547-5400

William P. Donovan, Jr. (admitted *pro hac*  
*vice*)  
2049 Century Park East  
Suite 3200  
Los Angeles, California  
(310) 788-4121

*Attorneys for Defendant Trustpilot, Inc.*